Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
Modernizing the E-Rate	)	WC Docket No. 13-184
Program for Schools and Libraries	)	

COMMENTS BY THE OKLAHOMA STATE DEPARTMENT OF EDUCATION, LEARNING TECHNOLOGIES, RELATED TO THE E-RATE 2.0 NOTICE OF PROPOSED RULEMAKING

November 8, 2013

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Oklahoma Overview

Oklahoma has 517 public school districts, 1700+ individual schools, and over 670,000 students. School district size has a range of under 100 students to 45,000 students, with population densities from greater than 5,000 residents per square mile to less than one resident per square mile.

The Oklahoma State Department of Education participated in drafting comments with other organizations, and these comments are in addition to those previously filed.

Oklahoma Connectivity

Oklahoma conducted the Education Superhighway speed test in February 2013, with 93% of individual schools participating. That data showed that,

compared to the State Educational Technology Directors Association (SETDA) minimum recommendations[1]:

- Only 9% of Oklahoma districts, accounting for about 3% of students, met the 2014-2015 recommended minimums.
- Over half of Oklahoma districts were at, or less than, a quarter of the 2014-2015 recommended minimums.
- No Oklahoma district met the 2017-2018 recommended minimums.

With these gaps, E-Rate is critical to helping Oklahoma schools prepare for learning in the digital age.

Funding

Without a substantial increase in the funding cap, any changes to the program will just reshuffle winners and losers, with only limited increase in connectivity. Meeting this need and retooling America's schools will require an approximate doubling of the funding cap. All applicants that meet the requirements for the program should receive some funding. Any limits on funding should be transparent, and take into account the circumstances of schools.

Focus

When E-rate began, then-current digital technology in schools was almost exclusively limited to desktop computers, with TV-sized monitors in computer labs. Either teachers brought their students to the lab to "do technology," or they dropped students off with a "technology teacher." Life in the classroom of the late 1990's looked much like life in the classroom of the late 1950's.

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[1] Fox, C., et al., *The Broadband Imperative: Recommendations to Address K-12 Education Infrastructure Needs*. 2012, State Educational Technology Directors Association (SETDA): Washington, DC

Today, we recognize that mobility with ubiquitous access is a critical step in allowing all students to fully participate in learning in the digital age. Yet many students can find better, faster access at a coffee shop than in school.

The focus of the program should be connecting students in school, not just connecting buildings. That focus should include setting minimum bandwidth specifications based on the per one thousand student and staff recommendations provided by SETDA. As the SETDA recommendations do not scale properly when schools have fewer than three hundred or so students and staff, the program should include a minimum recommended connection. Wireless connectivity should sustain those recommended Internet speeds for the students and staff. (*E-rate NPRM ¶ 27*)

Eliminate Priority 1 and Priority 2.

Connecting students, not just buildings, means schools have to install powerful, flexible wireless throughout, not just in classrooms. As the sequence of upgrades will depend on the unique circumstances of each school, each school will be able to make the best determination of where to spend their funds. This approach also applies to legacy services - schools will no longer purchase services that do not make sense, and states can provide guidance to their districts about priorities. (*E-rate NPRM ¶¶ 65, 92-94*)

Sensible Implementation of CIPA

Even if every student had a connection that met the SETDA minimum recommendations and every student had ubiquitous access to powerful technology to make use of these high speed connections, many students still would still not be connected as they would be in schools with filtering that far exceeds that required by CIPA, but CIPA would still be blamed. (Most teachers have been told at some time, "We'll lose funding!" if this site or that social network was unblocked.)

Almost all schools would filter even if CIPA did not exist. Providing clear, sensible guidelines for CIPA will allow the local school and community to know where CIPA requirements end and their own local standards begin. As students and staff will easily be able to find out what restrictions CIPA requires they will also be able to press for more open access in their schools.

CIPA requirements should only apply to Internet connections funded through the E-Rate program. CIPA requirements should *not* extend to school-owned devices that do not connect through the E-rate funded network, such as when the devices are off campus and not routed through the school network. Such devices often are not purchased with federal funds, and schools are capable of making their own decisions as to how much filtering is required.

CIPA guidance should also recognize that, with current known technologies, absolute protection from visual representations prohibited by CIPA is not possible without also blocking student access to many necessary resources. Instead, CIPA guidance should require schools to use their filtering technology in combination with their digital citizenship program to provide meaningful protection while educating students in making appropriate choices.

Furthermore, CIPA guidance should only include connections where schools have a reasonable chance of applying an appropriate filter. For example, schools with current technology cannot monitor the content of VPN connections, remote proxy connections, or cellular antennas added to improve mobile device connectivity, yet when schools block these types of connections, they reduce the usefulness of their network for teachers and students. Instead, schools should use their digital citizenship programs to educate students and school personnel about appropriate use, and provide guidance to guests. (*E-rate NPRM ¶¶ 86, 270-275*).

Educational Outcome Measures

While measuring educational outcomes based on E-Rate funding is a worthy goal, states are continuing to implement systems to evaluate schools to help all schools become high performing. However, none of the current or proposed assessments has been specifically designed to measure outcomes based on programs that allow students to fully participate in learning in the digital age. As such, this proposal should wait until effective assessments have been created and validated (*E-rate NPRM ¶ 40*).

SETDA principles

The principles proposed by SETDA provide effective guidance for reform:

- Principle #1: A Modernized E-Rate Should Be Guided by Few, Clear Performance Goals and Metrics
- Principle #2: A Modernized E-Rate Must Better Align to Education Needs and Governance Responsibilities
- Principle #3: A Modernized E-Rate Must Prioritize Equity of Access to Robust Broadband by 100% of Schools
- Principle #4: A Modernized E-Rate Must be Fiscally Responsible
- Principle #5: A Modernized E-Rate Should Incent Participant Innovation
- Principle #6: A Modernized E-Rate Should Reduce Participant Burden
- Principle #7: A Modernized E-Rate Must Provide Specific, Predictable and Sufficient Funding to Address K-12 Broadband Infrastructure Needs

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